

**From:** [Gallagher, Shirin](#)  
**To:** [Marshallonis, Dino](#)  
**Subject:** FW: Merrill Compliance Timeline [SR-ACTIVE.FID4791447]  
**Date:** Friday, June 05, 2020 5:38:57 PM

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**From:** McIntyre, Krista K. <krista.mcintyre@stoel.com>  
**Sent:** Friday, March 27, 2020 3:42 PM  
**To:** Gallagher, Shirin <Gallagher.Shirin@epa.gov>; Keenan, John <keenan.john@epa.gov>  
**Subject:** Merrill Compliance Timeline [SR-ACTIVE.FID4791447]

Thank you for the call today. Appreciate your consideration of our questions prompted by these unprecedented circumstances.

Dates for Compliance

- March 26, 2020 – order devices
- June 1, 2020 -- shipment from Miratech to Merrill
- June 1, 2020 – submit permit application to EPA
- No later than June 30, 2020 – installation of devices on both engines
- No later than November 1, 2020 (before closing at end of season) – performance test

Questions:

- How to provide flexibility for the compliance dates? (Bodine memo?)
- Final penalty \$123,552, please?
- Approach to defer penalty payments until Merrill returns to normal operation/revenue generation? (KKM to get information)

Talk soon. KKM

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